

1 BROOKS R. BROWN (SBN 250724)
2 *bbrown@goodwinprocter.com*
3 STEVEN A. ELLIS (SBN 171742)
4 *sellis@goodwinprocter.com*
5 **GOODWIN PROCTER LLP**
6 601 S. Figueroa Street, 41st Floor
7 Los Angeles, California 90017
8 Tel.: 213.426.2500
9 Fax.: 213.623.1673

10 THOMAS M. HEFFERON (pro hac vice)
11 *thefferon@goodwinprocter.com*
12 J. CHRIS SUEDEKUM (pro hac vice)
13 *csuedekum@goodwinprocter.com*
14 **GOODWIN PROCTER LLP**
15 901 New York Avenue NW
16 Washington, DC 20001
17 Tel.: 202.346.4000
18 Fax.: 202.346.4444

19 Attorneys for Defendant:
20 **ALLIED INTERSTATE, LLC**

21 [ADDITIONAL COUNSEL LISTED IN
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1 Pursuant to Local Rule 7.1(g)(2), Plaintiff Jennifer Rodriguez (“Rodriguez”)
 2 or (“Plaintiff”) and Defendant Allied Interstate, LLC (“Allied” or “Defendant”)
 3 (together, with Plaintiff, the “Parties”), through their undersigned counsel, hereby
 4 stipulate to, and jointly move this Court for an order (a) setting the expert disclosure
 5 deadline (excluding class certification issues) to be served on or before June 9,
 6 2014; (b) setting the rebuttal disclosure deadline to be served on or before June 30,
 7 2014; (c) setting July 25, 2014 as the deadline for the completion of all discovery,
 8 including expert discovery; and (d) setting August 22, 2014 as the deadline for all
 9 motions (excluding motions to amend or join parties, Plaintiffs’ motion for class
 10 certification, or motions in limine). A Proposed Order is submitted herewith.

11 As grounds for this Joint Motion, Plaintiff and Defendant stipulate and agree
 12 as follows:

13 1. On June 14, 2013, the Court entered a Scheduling Order governing this
 14 action (ECF No. 19). Among other deadlines, the Scheduling Order set March 7,
 15 2014 as the deadline for expert disclosures (excluding class certification experts)
 16 and April 4, 2014 as the deadline for any rebuttal expert disclosures. Order at 2.
 17 The Order stated that all discovery must be completed on or before May 9, 2014 and
 18 that all motions (excluding motions to amend or join parties, Plaintiffs’ motion for
 19 class certification, and motions in limine) shall be filed on or before June 13, 2014.
 20 *Id.* at 3.¹

21 2. On December 23, 2013, the Court entered an order granting the parties’
 22 Joint Motion to Continue Hearing Date and Briefing Schedule on Plaintiff’s Motion
 23 for Class Certification (ECF No. 46). The Court set February 21, 2014 as the
 24 hearing date for Plaintiff’s motion for class certification.

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 27 ¹ The Scheduling Order set December 13, 2013 as the deadline for Plaintiff’s motion
 28 for class certification. Order at 2. Thus, the Scheduling Order originally
 contemplated that these events would occur after resolution of Plaintiff’s Motion for
 Class Certification.

1 3. On February 5, 2014, the Court again continued the briefing schedule
 2 and hearing date on Plaintiff's motion for class certification to grant Plaintiff an
 3 opportunity to take depositions of four individuals (ECF No. 62). The Court
 4 continued the hearing date on Plaintiff's motion for class certification to April 4,
 5 2014.

6 4. In light of the April 4, 2014 hearing date on Plaintiff's motion for class
 7 certification, the parties respectfully request the Court delay the upcoming expert
 8 disclosure deadlines until after the resolution of Plaintiff's motion for class
 9 certification. Such an extension is necessary because the Court's ruling on class
 10 certification will define the scope of Plaintiff's claims and remaining issues for trial.
 11 Accordingly, the parties propose the Court set the following dates:

- 12 a. Expert disclosures (excluding class certification issues) required by
 13 Fed. R. Civ. P. 26(a)(2) shall be served on all parties on or before
 14 June 9, 2014.
- 15 b. Any contradictory or rebuttal information shall be disclosed on or
 16 before June 30, 2014.
- 17 c. All discovery, including expert discovery, shall be completed by all
 18 parties on or before July 25, 2014.
- 19 d. All motions (excluding motions to amend or join parties, Plaintiffs'
 20 motion for class certification, or motions in limine) shall be filed on
 21 or before August 22, 2014.

22 5. The relief sought by this Joint Motion will not unduly delay this case or
 23 alter the trial date in this Court's Scheduling Order (ECF No. 19), which is currently
 24 scheduled for December 8, 2014.

25 6. Against this background, there is good cause for entry of the requested
 26 Proposed Order and no party will be prejudiced by it.

27 WHEREFORE, for all the foregoing reasons, the parties respectfully request
 28 this Court (a) set the expert disclosure deadline (excluding class certification issues)

1 as June 9, 2014; (b) set the rebuttal disclosure deadline as June 30, 2014; (c) set July
2 25, 2014 as the deadline for the completion of all discovery, including expert
3 discovery; (d) set August 22, 2014 as the deadline for all motions (excluding
4 motions to amend or join parties, Plaintiffs' motion for class certification, or
5 motions in limine); and (e) enter the Proposed Order submitted herewith.

6
7 Respectfully submitted,

8 Dated: March 4, 2014

9 By: s/ Matthew Loker (with permission)
10 ABBAS KAZEROUNIAN
11 *ak@kazlg.com*
12 MATTHEW LOKER
13 *ml@kazlg.com*
14 **KAZEROUNI LAW GROUP, APC**
15 245 Fischer Avenue, Suite D1
16 Costa Mesa, CA 92626
17 Tel. 800.400.6808
18 Fax. 800.520.5523

19 JOSHUA B. SWIGART
20 *josh@westcoastlitigation.com*
21 **HYDE & SWIGART**
22 411 Camino Del Rio South, Suite 301
23 San Diego, CA 92108
24 Tel. 619.233.7770
25 Fax. 619.297.1022

26 TODD M. FRIEDMAN
27 *tfriedman@attorneysforconsumers.com*
28 NICHOLAS J. BONTRAGER
29 *nbontrager@attorneysforconsumers.com*
30 **LAW OFFICES OF TODD M.**
31 **FRIEDMAN, P.C.**
32 369 S. Doheny Drive, Suite 415
33 Beverly Hills, CA 90211
34 Tel. 877.206.4741
35 Fax. 866.633.0228

36 Counsel for Plaintiff:
37 JENNIFER RODRIGUEZ

38 Dated: March 4, 2014

39 By: s/ Thomas M. Hefferon
40 BROOKS R. BROWN
41 *bbrown@goodwinprocter.com*
42 STEVEN A. ELLIS
43 *sellis@goodwinprocter.com*
44 THOMAS M. HEFFERON (pro hac vice)

thefferon@goodwinprocter.com
J. CHRIS SUEDEKUM (pro hac vice)
csuedekum@goodwinprocter.com
GOODWIN PROCTER LLP

Attorneys for Defendant:
ALLIED INTERSTATE, LLC

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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over
3 the age of 18 and not a party to the within action. My business address is: 601
3 South Figueroa Street, 41st Floor, Los Angeles, CA 90017.

4 On **March 4, 2014**, I served the following documents by placing a true copy
5 thereof in a sealed envelope(s) on the persons below as follows:

6 **STIPULATION AND JOINT MOTION WITH RESPECT TO EXPERT
DISCLOSURE DEADLINES**

7 Todd M. Friedman
Nicholas J. Bontrager
8 LAW OFFICES OF TODD M.
9 FRIEDMAN, P.C.
369 S. Doheny Drive, Suite 415
10 Beverly Hills, CA 90211

Counsel for Plaintiff: *Jennifer Rodriguez*
Tel. 877.206.4741
Fax. 866.633.0228
tfriedman@attorneysforconsumers.com
nbontrager@attorneysforconsumers.com

11 Abbas Kazerounian
Matthew Loker
12 KAZEROUNI LAW GROUP, APC
13 245 Fischer Avenue, Suite D1
Costa Mesa, CA 92626

Counsel for Plaintiff: *Jennifer Rodriguez*
Tel. 800.400.6808
Fax. 800.520.5523
ak@kazlg.com
ml@kazlg.com

14 Joshua B. Swigart
15 HYDE & SWIGART
16 411 Camino Del Rio South, Suite 301
San Diego, CA 92108

Counsel for Plaintiff: *Jennifer Rodriguez*
Tel. 619.233.7770
Fax. 619.297.1022
josh@westcoastlitigation.com

17 (CM/ECF Electronic Filing) I caused the above document(s) to be
18 transmitted to the office(s) of the addressee(s) listed above by electronic
19 mail at the e-mail address(es) set forth above pursuant to
20 Fed.R.Civ.P.5(d)(1). "A Notice of Electronic Filing (NEF) is generated
21 automatically by the ECF system upon completion of an electronic filing.
The NEF, when e-mailed to the e-mail address of record in the case, shall
22 constitute the proof of service as required by Fed.R.Civ.P.5(d)(1). A copy of
the NEF shall be attached to any document served in the traditional manner
upon any party appearing pro se."

23 I declare under penalty of perjury that I am employed in the office of a
24 member of the bar of this Court at whose direction this service was made and that
the foregoing is true and correct.

25 Executed on **March 4, 2014**, at Los Angeles, California.

26

 Britani N. Naisbitt

27 (Type or print name)



28 (Signature)